

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 00-6258-CR-FERGUSON

UNITED STATES OF AMERICA,)
vs.)
HAMLET VARGAS,)
LIDIA ESTER RAMOS,)
Defendants.)

)

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GOVERNMENT'S MOTION TO CONTINUE TRIAL

The United States of America, by and through the undersigned Assistant United States Attorney, files this motion to continue the trial set for January 29, 2001 for the following reason:

1. The undersigned prosecutor's mother-in-law has been diagnosed with cancer in her pancreas and liver. Attempts to treat her condition locally have failed.

The undersigned prosecutor's mother-in-law traveled with his family to Mexico to seek alternative treatments not available in the United States and to spend time with her relatives.

The undersigned prosecutor's mother-in-law's health has recently deteriorated dramatically and she is likely to succumb to the cancer shortly. The undersigned prosecutor will or has traveled to Mexico to provide emotional support to his wife and to care for his children. The undersigned prosecutor will be out of the country for an unknown amount of time due to the nature of the emergency. Therefore, a thirty (30) day continuance is requested.

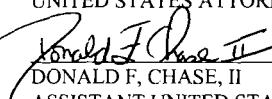
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Wherefore, for the foregoing reason, the United States of America requests a continuance of the sentencing for 30 days.

Respectfully submitted,

GUY A. LEWIS
UNITED STATES ATTORNEY

By:


DONALD F. CHASE, II
ASSISTANT UNITED STATES ATTORNEY
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this 19th day of January, 2001 to: Joaquin Perez, Esq. And Nelson Rodriguez, Esq., 6780 Coral Way, Miami, FL 33155.


DONALD F. CHASE, II
ASSISTANT UNITED STATES ATTORNEY